

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

**IN RE:**

**SUSSEX MANOR LLC  
xx-xxx-2900  
3000 MacArthur  
Orange, Texas 77630**

**DEBTOR**

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**CAUSE NO. 10-10571  
(CHAPTER 11)**

**MOTION FOR AUTHORITY TO USE CASH COLLATERAL**

**NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH RESPONSE. IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF A RESPONSE IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.**

COMES NOW, SUSSEX MANOR LLC, Debtor, and files this motion in accordance with 11 U.S.C. § 363(c) and Bankruptcy Rule 4001, and would show the Court the following:

1. Debtor, Sussex Manor LLC, whose address is 3000 MacArthur, Orange, Texas 77630, filed its petition for relief under Chapter 11 of the Bankruptcy Code on September 7, 2010, and since such date has continued in possession of its property and operation of its business.
2. Amron Housing Group, c/o Alan Sanders of Sanders and Sanders, LLP, whose mailing address is P. O. Box 519, Orange, Texas 77631-0519, is the holder of a security interest in Debtor's Apartment Complex at a value in excess of \$4,100,000.00.

3. Debtor's major source of income is from the operation of its business and the collection of its rents from the apartment complex. If Debtor is not permitted to use such cash collateral, it will have to cease its business operations.

4. In the event Debtor is authorized to use such cash collateral, Amron Housing Group is adequately protected in the amount of rents will continue to appreciate from the petition date, as the occupancy rate should increase from 83% to approximately 95%.

WHEREFORE, Debtor prays for an order authorizing it to use the cash equivalents acquired thereafter in order to continue in operation of its business; including but not limited to paying its employees, purchasing supplies and paying overhead business expenses, as set forth in the attached Exhibit "A".

DATED: September 14, 2010

Respectfully submitted,

**MAIDA LAW FIRM, P.C.**  
**4320 Calder Avenue**  
**Beaumont, Texas 77706**  
**(409) 898-8200; Fax No. (409) 898-8400**

BY: /s/ Frank J. Maida  
Frank J. Maida  
State Bar No. 12845600

**ATTORNEYS FOR DEBTOR**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing Motion for Authority to Use Cash Collateral has been properly forwarded to all parties in interest on the attached matrix by electronic mail, or first class mail on this the 14<sup>th</sup> day of September, 2010.

/s/ Frank J. Maida

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Frank J. Maida